510(k) SUMMARY

NormaTec, Inc.'s NormaTec PCD

Submitter's Name, Address, Telephone Number, Contact Person and Date Prepared

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Contact Person:

Jonathan S. Kahan

Date Prepared:

October 16, 2001

Name of Device and Name/Address of Sponsor

NormaTec PCD

Laura Jacobs, M.D., Ph.D. 60 W. Germantown Pike E. Norriton, PA 19401

Common or Usual Name

Noninvasive pneumatic compression device

Classification Name

Compressible Limb Sleeve

Predicate Devices

Camp GCS 2000 (K935998), Wright Linear Pump (K830577), Talley Multicom 500 (K915637), Mego Afek Lymphapress (K810338), and Baxter Pulsatile Anti-Embolism System Pump (PAS II) (K911853).

Intended Use

The NormaTec PCD is intended to be used to apply pressure to the extremities. The NormaTec PCD is indicated for use in the treatment of:

Lymphedema and other edematous conditions, including

Congenital lymphedema (Millroy's disease, lymphedema praecox, and lymphedema tarda)
Post-mastectomy lymphedema
Post-infection lymphedema
Post-traumatic lymphedema
Post-surgical lymphedema
Post-radiation-treatment lymphedema

Venous insufficiency

Venous stasis ulceration

and the prevention of:

Deep Vein Thrombosis

Technological Characteristics and Substantial Equivalence

The NormaTec PCD is substantially equivalent to its predicates because it has the same intended use and very similar technological characteristics. Both NormaTec's PCD and its predicates are intended to apply pressure to the extremities to treat edematous states like lymphedema, and to prevent deep vein thrombosis.

NormaTec's PCD has very similar components as its predicate devices and very similar principles of operation. Each device consists of an electrically generated source of compressed air, tubing to convey the pressurized air to the sleeve, control of pressure applied cyclically and simultaneous treatment of two limbs, if necessary. Like the predicates, pressure is pulsed to the affected limb for a specified period of time, followed by a rest period, according to the physician's prescription.

Performance Data

The NormaTec PCD underwent electromagnetic interference testing, burst testing, safety testing and quality assurance testing. In all instances, the NormaTec PCD functioned as intended and the results observed were as expected.



Food and Drug Administration 9200 Corporate Boulevard Rockville MD 20850

DEC 21 2001

Normatec c/o Mr. Jonathan S. Kahan, Esq. Hogan & Hartson, LLP 555 Thirteenth Street Washington, DC 20004-1109

Re:

K013436

Trade Name: NormaTec PCD

Regulation Number: 21 CFR 870.5800 Regulation Name: Compressible limb sleeve

Regulatory Class: II Product Code: JOW Dated: October 16, 2001 Received: October 16, 2001

Dear Mr. Kahan:

We have reviewed your Section 510(k) premarket notification of intent to market the device referenced above and have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act) that do not require approval of a premarket approval application (PMA). You may, therefore, market the device, subject to the general controls provisions of the Act. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration.

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to such additional controls. Existing major regulations affecting your device can be found in the Code of Federal Regulations, Title 21, Parts 800 to 898. In addition, FDA may publish further announcements concerning your device in the <u>Federal Register</u>.

Please be advised that FDA's issuance of a substantial equivalence determination does not mean that FDA has made a determination that your device complies with other requirements of the Act or any Federal statutes and regulations administered by other Federal agencies. You must comply with all the Act's requirements, including, but not limited to: registration and listing (21 CFR Part 807); labeling (21 CFR Part 801); good manufacturing practice requirements as set

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forth in the quality systems (QS) regulation (21 CFR Part 820); and if applicable, the electronic product radiation control provisions (Sections 531-542 of the Act); 21 CFR 1000-1050.

This letter will allow you to begin marketing your device as described in your Section 510(k) premarket notification. The FDA finding of substantial equivalence of your device to a legally marketed predicate device results in a classification for your device and thus, permits your device to proceed to the market.

If you desire specific advice for your device on our labeling regulation (21 CFR Part 801 and additionally 21 CFR Part 809.10 for in vitro diagnostic devices), please contact the Office of Compliance at (301) 594-4586. Additionally, for questions on the promotion and advertising of your device, please contact the Office of Compliance at (301) 594-4639. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21CFR Part 807.97). Other general information on your responsibilities under the Act may be obtained from the Division of Small Manufacturers, International and Consumer Assistance at its toll-free number (800) 638-2041 or (301) 443-6597 or at its Internet address http://www.fda.gov/cdrh/dsma/dsmamain.html

Sincerely yours,

Bram Zuckerman, M.D.

Acting Director

Division of Cardiovascular and

Respiratory Devices

Office of Device Evaluation

Center for Devices and Radiological Health

Enclosure

INDICATIONS FOR USE FORM

510(k) Number (if known): <u>KO 13436</u>
Device Name: NormaTec PCD
Indications for Use: The NormaTec PCD is intended to apply pressure to the extremities to treat:
Lymphedema and other edematous conditions, including
Congenital lymphedema (Millroy's disease, lymphedema praecox, and lymphedema tarda) Post-mastectomy lymphedema Post-infection lymphedema Post-traumatic lymphedema Post-surgical lymphedema Post-radiation-treatment lymphedema
Venous insufficiency
Venous stasis ulceration
and to prevent:
Deep Vein Thrombosis
(PLEASE DO NOT WRITE BELOW THIS LINE CONTINUE ON ANOTHER PAGE IF NEEDED)
Concurrence of CDRH, Office of Device Evaluation (ODE) Division of Cardiovascular, & Respiratory Devices 510(k) Number

Over-The-Counter Use____

OR

Prescription Use X (Per 21 C.F.R. 801.109)